

May 24, 2007

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 03-123 Written *ex parte*

Dear Madam Secretary:

We are writing to renew our objections to Hamilton's "MARS Plan," which threatens to cut critical funding for STS. As Hamilton admits, tying the STS rate to the "MARS" rate could lead to "a potentially significant reduction in the per-minute rate for STS." Lowering the rate for STS would save very little money – the maximum projected cost for all STS minutes for the upcoming rate year is less than \$900,000. Cutting STS funding would cause severe harm to speech-disabled individuals, however, reducing critical outreach education programs and decreasing service quality. Adopting the MARS Plan, or otherwise trying to reduce the already small amounts spent on STS, would send a clear message that the FCC does not care about the speech-disabled. Surely, this is not what the FCC wants.

Oddly enough, Hamilton itself supports the \$3.4546 rate for STS and opposes NECA's proposed reductions in the rate. Yet, Hamilton endorses a plan that it believes could lead to a "potentially significant reduction in the per minute rate for STS." Where does Hamilton think these cost reductions should come from? Should there be less outreach and education? Should there be reductions in service quality or hours of operation? It makes no sense to reduce the STS rate simply to accommodate some formula that Hamilton has come up with. The rates should be based on what providers need to spend to provide good service to all individuals who need STS (or any other form of TRS). That is what the ADA requires, and it is what the FCC should insist on. Anything less is a betrayal of the FCC's duty to the speech-disabled community.

Accordingly, we renew our request that the FCC adopt a rate for STS that is no lower than the \$3.4546 rate based on providers' projections. If anything, the rate should be higher in order to encourage more outreach and marketing and ensure that Americans with speech disabilities know about and have access to the best possible relay service that puts them on the same

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footing as other Americans who use the traditional phone system. That is what “functional equivalency” requires and that is what the FCC must try to accomplish.

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This letter is submitted as an *ex parte* communication in the above-referenced proceeding, and is filed pursuant to Section 1.1206 of the Commission's rules.

Very truly yours,

Bob Segalman, Ph.D
Founder, Speech to Speech

Rebecca Ladew, MS
Speech Disabled Representative,
Maryland Governor's Advisory Board
for Telecommunications Relay

Hearing and Speech Disabled
Representative
~ National TRS Advisory Council
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